REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks.

Claims 1, 4, 7-9, 11-15, 17, 19, 20, 23-26, 29-38, 40, and 41 are pending in the application, with claims 1, 12, 20, 26, and 33 being independent. Applicant amends claims 1, 12, 20, and 26 to clarify features of the claimed subject matter. The original specification and drawings support these claim amendments at least at paragraph [0007]. Therefore, claims 1, 4, 7-9, 11-15, 17, 19, 20, 23-26, 29-38, 40, and 41 are presented and directed to subject matter of the original disclosure.

CLAIM REJECTIONS UNDER 35 U.S.C. § 102

Claims 1, 7, 8, 11-14, 17, 19, 20, 24-26, 29, 31-34, 36-38, and 41 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,369,835 Lin et al (hereinafter "Lin"). Applicant respectfully traverses the rejection.

Without conceding the propriety of the stated rejection, and only to advance the prosecution of this application, Applicant amends **independent claim 1** to further clarify features of the claimed subject matter. Amended claims 1 now recites a computer-implemented method comprising computer-executable instructions, the method comprising (emphasis added):

> examining a plurality of nodes within a media
> examining a plurality of nodes within a media timeline,
> wherein:
> the media timeline is for exposure over an
> application programming interface (API);
> one or more nodes reference respective media;

dividing the media timeline into one or more presentations, wherein each presentation describes a rendering of the media for a particular interval of time, and wherein each presentation describes a collection of software components that, when executed, provides the described rendering of the media for the particular interval of time, wherein the collection of software components include a transform and comprise at least one of *a timeline source configured to support a dynamic change to the media timeline*, a first media source, a media session, a media engine, a source resolver, or a media sink;

configuring at least one node for communication of events to another node such that a change may be made to the media timeline while the media timeline is rendered, wherein the rendered media timeline is presented on an output device;

loading each software component described by a first collection;

executing each software component described by the first collection; and

loading each software component described by a second collection, wherein each software component that is described by the second collection is loaded during the executing of the first collection *such that the first collection is available to be rendered on the output device while a second media source is loaded*.

Applicant respectfully submits that no such method is disclosed by Lin.

In making out the rejection of claim 1, the Office indicates that Col. 3, lines 3-37 and Col. 10, lines 43-54 in Lin disclose all of the features of claim 1. *See,* Office Action, page 3. Applicant respectfully disagrees that these features are disclosed in Lin. Rather, Lin describes generating a movie file from a slide show presentation created with a presentation program. *See,* Abstract. More specifically, Lin describes that a movie application programming interface such as "QuickTime" and "Video for Windows" may be selected to save the movie data in a movie file. *See,* Lin, Col. 3, lines 3-6.

Nevertheless, without conceding the propriety of the stated rejection, Applicant amends independent claim 1 to advance the prosecution of this application. Amended

claim 1 now recites "*dividing the media timeline into one or more presentations, wherein each presentation describes a rendering of the media for a particular interval of time, and wherein each presentation describes a collection of software components that, when executed, provides the described rendering of the media for the particular interval of time, wherein the collection of software components include a transform and comprise at least one of **a timeline source configured to support dynamic changes to the media timeline**, a first media source, a media session, a media engine, a source resolver, or a media sink...loading each software component described by a second collection, wherein each software component that is described by the second collection is loaded during the executing of the first collection **such that the first collection is available to be rendered on the output device while a second media source is loaded.**"*

As Lin fails to disclose these recited features, Applicant respectfully submits that claim 1 is not anticipated by Lin. Therefore, Applicant respectfully requests that the §102 rejections be withdrawn.

Dependent claims 7-8 and 10-11 depend directly from independent claim 1 and thus are allowable as depending from an allowable base claim. Dependent claims 7-8 and 10-11 are also allowable for their own recited features that, in combination with those recited in claim 1, are not shown by the Office to be disclosed by Lin.

Thus, Applicant respectfully submits that the Office has failed to show that each and every feature is disclosed, and thus the claims are not anticipated by Lin. Applicant respectfully requests that the § 102 rejections be withdrawn.

Independent Claim 12

Without conceding the propriety of the stated rejection, and only to advance the prosecution of this application, Applicant amends independent claim 12 to clarify features of the claimed subject matter. Amended claim 12 recites a computer-implemented method comprising computer-executable instructions, the method comprising (emphasis added):

> receiving a call from an application over an API for rendering a media timeline, wherein:
>
> the media timeline includes a plurality of nodes, wherein the plurality of nodes comprises at least a parent node and a child node;
>
> two or more nodes reference respective media;
>
> the media timeline defines one or more presentations including media;
>
> rendering the media timeline to output each presentation to an output device, wherein the rendering further comprises dividing the media timeline into the one or more presentations such that each presentation describes a collection of software components utilized to render media for a particular interval of time, wherein the collection of software components include a transform and comprise at least one of a timeline source *configured to support a dynamic change to the media timeline*, a media source, a media session, a media engine, a source resolver, and a media sink;
>
> configuring at least one node for communication of events to another node such that a change may be made to the media timeline while the media timeline is rendered by performing at least one of the following:
>
> > changing to a property of the at least one node;
> >
> > adding one or more additional nodes as a child to the at least one node;
> >
> > removing one or more nodes that are children of the at least one node;
> >
> > adding an effect to the at least one node; and
> >
> > removing an effect from the at least one node;
> >
> > loading each software component described by a first collection;

executing each software component described by the first collection; and

loading each software component described by a second collection.

Applicant respectfully submits that Lin fails to disclose the features of independent claim 12 for reasons similar to those discussed above with respect to independent claim 1. For example, Lin fails to disclose *"rendering the media timeline to output each presentation to an output device, wherein the rendering further comprises dividing the media timeline into the one or more presentations such that each presentation describes a collection of software components utilized to render media for a particular interval of time, wherein the collection of software components include a transform and comprise at least one of **a timeline source configured to support dynamic changes to the media timeline**, a media source, a media session, a media engine, a source resolver, and a media sink,"* as disclosed in Applicant's amended claim 12.

As Lin fails to disclose these recited features, Applicant respectfully submits that claim 12 is not anticipated by Lin. Therefore, Applicant respectfully requests that the §102 rejections be withdrawn.

Dependent claims 13, 14, 17, and 19 depend directly from independent claim 12 and thus are allowable as depending from an allowable base claim. Dependent claims 13, 14, 17, and 19 are also allowable for their own recited features that, in combination with those recited in claim 12, are not shown by the Office to be disclosed by Lin.

Thus, Applicant respectfully submits that the Office has failed to show that each and every feature is disclosed, and thus the claims are not anticipated by Lin. Applicant respectfully requests that § 102 rejections be withdrawn.

Independent Claim 20

Without conceding the propriety of the stated rejection, and only to advance the prosecution of this application, Applicant amends independent claim 20 to clarify features of this application. Amended claim 20 now recites one or more computer-readable storage media comprising computer executable instructions that, when executed on a computer, direct the computer to divide a media timeline into one or more presentations, wherein (emphasis added):

> the media timeline is for exposure via an API to one or more applications;
> the media timeline includes a plurality of nodes, wherein the plurality of nodes comprises at least one of a parent node and a child node;
> at least two nodes reference respective media;
> each presentation describes rendering of respective media to an output device for a particular interval of time, wherein each presentation describes a collection of software components that, when executed, provide the described rendering of media for the particular interval of time, and wherein the collection of software components include a transform and comprise at least one of a timeline source *configured to support a dynamic change to the media timeline*, a media source, a media session, a media engine, a source resolver, and a media sink; and
> the one or more computer-readable media further comprises computer executable instructions that, when executed on the computer, direct the computer to:
> load each software component described by a first collection;
> execute each software component described by the first collection; and
> load each software component described by a second collection.

Applicant respectfully submits that Lin fails to disclose the features of independent claim 20 for reasons similar to those discussed above with respect to independent claim 1. For example, Lin fails to disclose "*each presentation describes*

rendering of respective media to an output device for a particular interval of time,

wherein each presentation describes a collection of software components that, when

executed, provide the described rendering of media for the particular interval of time,

and wherein the collection of software components include a transform and comprise at

*least one of a timeline source **configured to support dynamic changes to the media***

***timeline**, a media source, a media session, a media engine, a source resolver, and a*

media sink," as disclosed in Applicant's amended claim 20.

As Lin fails to disclose these recited features, Applicant respectfully submits that

claim 20 is not anticipated by Lin. Therefore, Applicant respectfully requests that the

§102 rejections be withdrawn.

Dependent claims 24 and 25 depend directly from independent claim 20 and

thus are allowable as depending from an allowable base claim. Dependent claims 24 and

25 are also allowable for their own recited features that, in combination with those recited

in claim 20, are not shown by the Office to be disclosed in Lin.

Thus, Applicant respectfully submits that the Office has failed to show that each

and every feature is disclosed, and thus the claims are not anticipated by Lin. Applicant

respectfully requests that the § 102 rejections be withdrawn.

<u>**Independent Claim 26**</u>

Without conceding the propriety of the stated rejection, and only to advance the

prosecution of this application, Applicant amends independent claim 26 to clarify

features of this application. Amended claim 26 now recites a system comprising:

> a memory;
> a processor coupled to the memory;

a plurality of media;

a plurality of applications; and

an infrastructure layer that:

provides an API for the plurality of applications which exposes a media timeline that describes one or more presentations of the plurality of media; and

manages rendering of the one or more presentations, wherein each presentation describes rendering of media to an output device for a particular interval of time, and wherein each presentation describes a collection of software components configured for dynamic loading such that the collection of software components provide the described rendering of the media for the particular interval of time, wherein the collection of software components include a transform and comprise at least one of a timeline source *configured to support a dynamic change to the media timeline*, a media source, a media session, a media engine, a source resolver, and a media sink, wherein the collection of software components are loaded only when needed.

Applicant respectfully submits that Lin fails to disclose the features of independent claim 26 for reasons similar to those discussed above with respect to independent claim 1. For example, Lin fails to disclose *"manages rendering of the one or more presentations, wherein each presentation describes rendering of media to an output device for a particular interval of time, and wherein each presentation describes a collection of software components configured for dynamic loading such that the collection of software components provide the described rendering of the media for the particular interval of time, wherein the collection of software components include a transform and comprise at least one of a timeline source configured to support dynamic changes to the media timeline, a media source, a media session, a media engine, a source resolver, and a media sink, wherein the collection of software components are loaded only when needed,"* as disclosed in Applicant's amended claim 26.

As Lin fails to disclose these recited features, Applicant respectfully submits that claim 20 is not anticipated by Lin. Therefore, Applicant respectfully requests that the §102 rejections be withdrawn.

Dependent claims 29, 31, and 32 depend directly from independent claim 26 and thus are allowable as depending from an allowable base claim. Dependent claims 29, 31, and 32 are also allowable for their own recited features that, in combination with those recited in claim 14, are not shown by the Office to be disclosed by Lin.

Thus, Applicant respectfully submits that the Office has failed to show that each and every feature is disclosed, and thus the claims are not anticipated by Lin and Applicant respectfully requests that the § 102 rejections be withdrawn.

Independent Claim 33

Independent claim 33 recites a timeline source comprising computer instructions that, when executed by a computer, provide (emphasis added):

> means for dividing a media timeline into one or more presentations each describing a rendering of one or more media during a particular interval of time, wherein the media timeline exposes a plurality of nodes to a plurality of applications, wherein one or more nodes reference respective said media, and ***wherein the media timeline is configured for dynamic loading such that metadata included in at least one node specifies a collection of nodes to be loaded when the media timeline is rendered***, wherein the rendered media timeline is presented on an output device;
> means for determining a topology for each presentation, wherein the topology references a collection of software components that, when executed, provides the rendering; and
> media processor means for executing the topology for each presentation that is described by the media timeline.

Applicant respectfully submits that no such method is disclosed by Lin.

In making out the rejection of claim 33, the Office indicates that Col. 13 lines 50-55 in Lin discloses the claimed feature of "the media timeline is configured for dynamic loading such that metadata included in at least one node specifies a collection of nodes to be loaded when the media timeline is rendered." *See,* Office Action, page 18. Applicant respectfully disagrees. Rather, this cited portion of Lin describes that audio tracks may be optionally edited with functions provided by the movie API such as "QuickTime". *See,* Lin, Col. 13, lines 50-53. This cited portion of Lin goes on to describe that the video samples in the movie file may be optionally edited using the functions provided with the movie API. *See,* Lin, Col. 13, lines 53-55.

In contrast, Applicant's claim 33 recites "*means for dividing a media timeline into one or more presentations each describing a rendering of one or more media during a particular interval of time, wherein the media timeline exposes a plurality of nodes to a plurality of applications, wherein one or more nodes reference respective said media, and **wherein the media timeline is configured for dynamic loading such that metadata included in at least one node specifies a collection of nodes to be loaded when the media timeline is rendered**, wherein the rendered media timeline is presented on an output device.*" As illustrated in FIG. 12 of Applicant's Specification, during or after the rendering of media referenced by the node 1206, metadata 1222 of node 1204 is examined that specifies a second grouping 1224 that includes node 1208 and 1210. *See,* Applicant's Specification, paragraph [00124]. Therefore, node 1208 and 1210 are loaded and media is output that is referenced by node 1210. *See,* Applicant's Specification,

paragraph [00124]. Likewise, the metadata 1226 of node 1208 specifies a third grouping 1228 that includes nodes 1212, 1214, 1216. *See,* Applicant's Specification, paragraph [00124]. Therefore, nodes 1212, 1214, 1216 are loaded to output data referenced by nodes 1214, 1216 after the output of data referenced by node 1210 is completed. *See,* Applicant's Specification, paragraph [00124].

As the Office has failed to show that Lin discloses these recited features, Applicant respectfully submits that claim 20 is not anticipated by Lin. Therefore, Applicant respectfully requests that the §102 rejections be withdrawn.

Dependent claims 34, 36-38 and 41 depend directly from independent claim 33 and thus are allowable as depending from an allowable base claim. Dependent claims 34, 36-38 and 41 are also allowable for their own recited features that, in combination with those recited in claim 33, are not shown by the Office to be disclosed in Lin.

Thus, Applicant respectfully submits that the Office has failed to show that each and every feature is disclosed, and thus the claims are not anticipated by Lin. Applicant respectfully requests that the § 102 rejections be withdrawn.

CLAIM REJECTIONS UNDER 35 U.S.C. § 103

Claims 4, 9, 15, 23, 30, 35 and 40 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,369,835 Lin et al. (hereinafter "Lin") in view of U.S. Patent No. 6,266,053 French et al. (hereinafter "French"). Applicant respectfully traverses the rejection.

Applicant submits that all of the criteria set forth for making a *prima facie* case of obviousness have not been met by the Office. All of the § 103(a) rejections rely on Lin

as the primary reference. As explained with respect to independent claims 1, 12, 20, 26, and 33, Applicant submits that Lin fails to disclose the features of independent claims 1, 12, 20, 26, and 33. Dependent claims 4, 9, 15, 23, 30, and 40 depend from one of independent claims 1, 12, 20, 26, and 33, respectively, and are allowable by virtue of this dependency. These dependent claims are also allowable for their own recited features that, in combination with those recited in independent claims 1, 12, 20, 26, and 33 are not disclosed, taught, or suggested by Lin.

With respect to dependent claims 9 and 40, Applicant agrees with the Office that Lin fails to teach a node is specified as read-only. *See* Office Action, page 20.

With respect to dependent claims 4, 15, 23, 30, and 35, Applicant agrees with the Office that Lin fails to teach each said presentation describes a respective partial topology of software components; and the respective partial topology is for resolving into a full topology that references each software component utilized to provide a respective said presentation. *See* Office Action, page 19.

Applicant submits that French fails to compensate for the deficiencies of Lin. French is directed towards a technique for representing a time varying visual scene as a directed acyclic graph of data and operators that generates a sequence of image frames over specified time intervals. (Col. 3, lines 46-50). The system provides object-oriented representations for the scene in the form of an object catalog and project catalog. (Col. 7, lines 33-35).

Thus, Lin and French, alone or in combination, do not disclose, teach or suggest those features recited in Applicant's dependent claims 4, 9, 15, 23, 30, 35, and 40. Accordingly, Applicant submits that the evidence relied upon by the Office no longer

supports the rejections made under § 103 and thus Applicant respectfully requests that the

§ 103 rejection be withdrawn.

CONCLUSION

Claims 1, 4, 7-15, 17-20, 23-26, 29-38, 40, and 41 are in condition for allowance. Applicant respectfully requests reconsideration and prompt allowance of the subject application. If any issue remains unresolved that would prevent allowance of this case, the Office is requested to contact the undersigned attorney to resolve the issue.

Respectfully submitted,

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